

EX PARTE OR LATE FILED

DOCKET FILE COPY ORIGINAL

96.3 WQXR
the classical station

1560
WQEW am
STEREO

May 4, 1993

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

RECEIVED
MAY 5 1993
FCC MAIL ROOM

RECEIVED

MAY - 5 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: ET Docket No. 92-298 AM Stereo Standard

Dear Ms. Searcy,

On behalf of Interstate Broadcasting Company, Inc., licensee of WQEW and WQXR-FM, New York, New York, this letter is written regarding the reply comments for the subject Notice of Proposed Rule Making on an AM stereo standard.

Due to the very short interval for reply comments, this report is, accordingly, brief. I will, however, express my concerns regarding the AM stereo standard selection process and its relationship to the long-term future of AM radio broadcasting.

Interstate Broadcasting made a long-term decision late last year to broadcast a locally produced and originated American Popular Standards format on its AM facility, which up to that point had been simulcasting the classical music programming of WQXR-FM. We feel that there is room for high quality musical programming on the AM band. The station has been using the Kahn ISB system 24 hours a day since 1983.

Due to the characteristics of skywave propagation at the high side of the AM band, WQEW at 1560 kHz, suffers from severe nighttime phase distortion at night at a distance of only four to five miles from the transmitter site, well within the local coverage area. A phase separation system such as Motorola's C-Quam would be useless at our facility. We would totally have to eliminate stereo programming at night so as not to create a distorted image-shifting signal that would impact on mono listening as well as on stereo listening.

For the future of the AM broadcast band and the nearly 5000 AM stations in this country that are serving the public, we recommend that the National Institute of Standards and Technology evaluate the various stereo systems. The NIST has the staff of scientific and technical personnel available to properly do an objective and impartial test.

While many broadcasters want to get on the "bandwagon" for the obvious well promoted and funded system, let's make sure that the "bandwagon" does not have four flat tires, keeping AM radio at a dead end.

Sincerely,

